1   Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com
2   **GOODWIN PROCTER LLP**
135 Commonwealth Drive
3   Menlo Park, California 94025
Tel.: +1 650 752 3100
4   Fax.: +1 650 853 1038

5   Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com
6   Shane Brun (SBN 179079)
sbrun@goodwinlaw.com
7   Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com
8   **GOODWIN PROCTER LLP**
Three Embarcadero Center
9   San Francisco, California 94111
Tel.: +1 415 733 6000
10 Fax.: +1 415 677 9041

11 Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com
12 **GOODWIN PROCTER LLP**
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
13 Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

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Attorneys for Defendant: Otto Trucking LLC
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UNITED STATES DISTRICT COURT
16 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION
17
Waymo LLC,   Case No. 3:17-cv-00939-WHA
18
            Plaintiff,   **DEFENDANT OTTO TRUCKING'S**
19   **ADMINISTRATIVE MOTION TO FILE**
        v.   **UNDER SEAL PORTIONS OF ITS MOTION**
20   **IN LIMINE TO EXCLUDE TESTIMONY OF**
Uber Technologies, Inc.; Ottomotto LLC;   **DR. HESSELINK REGARDING**
21 Otto Trucking LLC,   **PROTECTIONS OF WAYMO'S ALLEGED**
                                            TRADE SECRETS
            Defendants.
22
                                            Courtroom: 8 (19th Floor)
23   Judge: Hon. William Alsup

24   Filed/Lodged Concurrently with:
                                            1. Declaration of Neel Chatterjee
25   2. [Proposed] Order
                                            3. Redacted/Unredacted Versions
26   4. Proof of Service

27   Trial: October 10, 2017

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OTTO TRUCKING'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
CASE NO. 3:17-CV-00939-WHA

1   Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC ("Otto

2 Trucking") submits this administrative motion for an order to file under seal portions of its Motion

3 in Limine to Exclude Testimony of Dr. Hesselink Regarding Protections of Waymo's Alleged

4 Trade Secrets (the "Hesselink Motion"). Specifically, Otto Trucking requests an order granting

5 leave to file under seal the confidential portions of the following documents:

6

Document	Portions to Be Filed Under Seal
Otto Trucking's Hesselink Motion	Highlighted Portions
Exhibit 1 to Vu Declaration	Entire Document
Exhibit 2 to Vu Declaration	Entire Document
Exhibit 3 to Vu Declaration	Entire Document
Exhibit 4 to Vu Declaration	Entire Document
Exhibit 5 to Vu Declaration	Highlighted Portions
Exhibit 6 to Vu Declaration	Entire Document
Exhibit 7 to Vu Declaration	Entire Document

17   The highlighted portions of the Hesselink Motion, the highlighted portions of Exhibit 5 to

18 the Vu Declaration, and the entirety of Exhibits 1, 2, 3, 4, 6 and 7 to the Vu Declaration contain

19 information that Waymo has designated "Confidential" or "Highly Confidential – Attorneys' Eyes

20 Only" pursuant to the Protective Order in this case. Otto Trucking states no position about

21 whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo

22 will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

23   Otto Trucking's request to seal is narrowly tailored to those portions of the Hesselink

24 Motion that merit sealing.

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26 Dated: September 16, 2017   Respectfully submitted,

27   By: */s/   Neel Chatterjee*
                                              Neel Chatterjee
28   *nchatterjee@goodwinlaw.com*

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1

Brett Schuman
bschuman@goodwinlaw.com

2

Shane Brun
sbrun@goodwinlaw.com

3

Rachel M. Walsh
rwalsh@goodwinlaw.com

4

Hong-An Vu
hvu@goodwinlaw.com

5

Hayes P. Hyde
hhyde@goodwinlaw.com

6

James Lin
jlin@goodwinlaw.com

7

GOODWIN PROCTER LLP

8

Attorneys for Defendant: Otto Trucking LLC

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OTTO TRUCKING'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
CASE NO. 3:17-CV-00939-WHA

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 16, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 16, 2017**.

/s/   *Neel Chatterjee*
                   NEEL CHATTERJEE

OTTO TRUCKING'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
CASE NO. 3:17-CV-00939-WHA